

LSK&D #: 860-7059 / 940179

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X  
ENRIQUETA MERA,

Plaintiff,

Index No.: 07 CV 6069

-against-

**RESPONSE TO PLAINTIFF'S  
INTERROGATORIES DATED  
OCTOBER 3, 2007**

BERTHA SANTIAGO, individually, and as the  
Prospective Fiduciary of the Estate of LUIS  
SANTIAGO, deceased,

Defendant.  
-----X

**PLEASE TAKE NOTICE**, defendant, BERTHA SANTIAGO, by her attorneys, LESTER SCHWAB KATZ & DWYER, LLP, responds to plaintiff's Interrogatories as follows:

1. Demand is made that you furnish the name, address and policy number with respect to any insurance carrier to which the defendant or the defendants-decedent made any claim with respect to the fire loss which gives rise to this action:

**Response:** Tower Insurance Company of New York, 120 Broadway, 30<sup>th</sup> Floor, New York, New York 10271 -- Policy No.: CPP2415189.

2. Demand is made that the preceding information with respect to any public adjuster who was utilized in connection with submission of any claim for the fire loss.

**Response:** Executive Adjustment Bureau by John Capreles /by Laureen Inearmato.

3. If general liability coverage in connection with this loss is available through any insurance carrier not disclosed pursuant to item 1 above, demand is made that you furnish the name and address thereof, together with the pertinent policy number.

**Response:** No other insurance is known to the defendant at the present time.

4. State whether or not the decedent made a last will and testament or other legal effective document directing the testamentary disposition of his property, and/or designating or appointing a fiduciary to act on behalf of his estate. If the answer to this Interrogatory is in the affirmative, demand is made that you produce a copy of any such document.

**Response:** Copy of decedent's last will and testament is attached.

5. Demand is made that you furnish the names, domicile and mailing addresses and dates of birth of each of the decedent's distributees, pursuant to EPTL 4.1-1 and EPTL 4.1-2. To assist you with the determination of who the decedent's distributees are, page 2 of the official Surrogates' Court form Petition for letters of administration is enclosed.

**Response:** To the best of defendant's knowledge, the following are decedent's distributees:

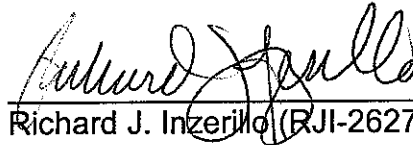
- Edwin Diaz (half brother) address unknown
- Victor Santiago (half brother)  
5084 Sunburst Lane  
Charlotte, North Carolina 28213
- Carmen Santiago (half sister) address unknown
- Audrey Santiago Cintron (daughter)  
132 Pershing Avenue  
Berlin, New York 03570.
- Rosalba P. Santiago Rodriguez (daughter)  
263 4<sup>th</sup> Avenue  
Garwood, New Jersey 07027
- Bertha Santiago (wife)

**PLEASE TAKE FURTHER NOTICE**, defendant reserves its right to amend and/or supplement this Response should further information become available up to and including the time of trial herein.

Dated: New York, New York  
November 2, 2007

Respectfully submitted,

LESTER SCHWAB KATZ & DWYER, LLP



Richard J. Inzerillo (RJI-2627)  
Attorneys for Defendant  
BERTHA SANTIAGO  
120 Broadway  
New York, New York 10271  
(212) 964-6611

TO:

Law Offices of  
William Cafaro  
Attorneys for Plaintiff  
641 Lexington Avenue  
20th Floor  
New York, New York 10022  
T: (212) 583-7400

Declaration of Service

I served the annexed RESPONSE TO PLAINTIFF'S INTER ROGATORIES DATED OCTOBER 3, 2007 by first-class mail on the following persons on November 2, 2007:

Law Offices of  
William Cafaro  
Attorneys for Plaintiff  
641 Lexington Avenue  
20th Floor  
New York, New York 10022

I declare under penalty of perjury that the foregoing is true and correct. Executed on November 2, 2007.

---

MARY LYNCH